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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JANET GARCIA, *ET AL*,  
Plaintiffs,  
v.  
CITY OF LOS ANGELES, A  
MUNICIPAL ENTITY  
Defendants.

CASE NO. 2:19-cv-06182-DSF-PLA  
[Assigned to the Hon. Paul L. Abrams  
– Courtroom 780]  
**DISCOVERY MATTER**  
**PLAINTIFFS’ NOTICE OF  
MOTION TO COMPEL  
DEFENDANT CITY OF LOA  
ANGELES’S RESPONSE TO  
PLAINTIFFS’ REQUEST FOR  
PRODUCTION OF DOCUMENTS  
(SET ONE)**  
Hearing Date: April 28, 2021  
Time: 10:00 a.m.  
Complaint Filed: July 18, 2019  
Discovery Cut-off: July 26, 2021  
Pretrial Conf: Feb. 14, 2022  
Trial: March 14, 2022

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26 Peter Diocson Jr., Marquis Ashley, Ali El-Bey, and  
27 Association for Responsible and Equitable Public  
28 Spending*

1 **TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that on April 28, 2021, at 10:00 a.m., or as  
3 soon thereafter as counsel may be heard by the above-entitled Court, located at 255  
4 E. Temple Street, Los Angeles, California 90012, Courtroom 780, 7th Floor in the  
5 courtroom of the Honorable Paul L. Abrams, Plaintiff will and hereby does move  
6 the Court for an order compelling the City to produce documents responsive to  
7 Plaintiffs' Requests for Production of Documents. This motion is brought on the  
8 following grounds: Plaintiffs' requests are relevant to the claims alleged, are time-  
9 limited and seek the production of discrete and specific document requests. The  
10 requests are proportional to the needs of the case, given the Constitutional issues at  
11 stake, the parties' resources and relative access to relevant information, and the  
12 importance of discovery in resolving the issues. Defendant has failed to provide  
13 written responses that comply with Rule 34 of the Federal Rules of Civil Procedure  
14 and has withheld documents that are both highly relevant and necessary to prove  
15 Plaintiffs' claims and defeat Defendant's defenses. Plaintiffs are entitled to full  
16 and complete responses to requests for production of documents and the  
17 production of all relevant, responsive documents.

18 Pursuant to Local Rule 37-1, the parties' counsel met and conferred  
19 regarding this motion initially on August 25, 2020 and have had significant  
20 communications and meetings thereafter. Plaintiffs have met the requirements for  
21 the preparation of the joint stipulation contained in the Federal Rule of Civil  
22 Procedure 37 and Local Rule 37 et al. (Declaration of Shayla Myers attached  
23 thereto). The Scheduling Order is attached as Appendix A and the Amended  
24 Scheduling Order is attached as Appendix B.

25 This motion is based on this Notice of Motion, the Joint Stipulation filed  
26 herewith, the declarations of Shayla Myers and Adrian Riskin, and upon such other  
27 matters as may be presented to the Court at the time of hearing.

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2 Dated: April 7, 2021  
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Legal Aid Foundation of Los Angeles,  
Schonbrun Seplow Harris Hoffman and Zeldes, LLP  
Kirkland & Ellis, LLP

5 By: /s/ Shayla Myers  
6 Shayla Myers Attorney for Plaintiffs  
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